

REMARKS

This Amendment is responsive to the paper identified above, and in any manner indicated below.

REFUSAL TO CONSIDER DUTY OF DISCLOSURE SUBMISSIONS-IMPROPER

In accordance with 37 CFR §§1.97 and 1.98, Applicant filed an Information Disclosure Statement (IDS) on 12 September 2002, and also made supplemental submissions on 13 September and 4 October 2002 to complete the information which was previously unavailable to Applicant and individuals under §1.56. However, attached to both the defective Office Action mailed 9 December 2002 and the defective replacement Office Action mailed 11 July 2003 was a copy of one of the Forms PTO-1449 which was submitted with the 12 September 2002 IDS with two of the references lined through, and no copy whatsoever of the List Of Prior Art Under §1.56 filed with the 12 September 2002 IDS was returned.

In accordance with MPEP §609, which instructs that, once the minimum requirements of §§1.97 and 1.98 are met, the Examiner has an obligation to consider the art filed, Applicant respectfully requests that copies of each of the Forms PTO-1449 and a copy of the List Of Prior Art Under §1.56 be returned bearing the Examiner's initials for all information listed thereon to indicate consideration of same.

PENDING CLAIMS

Claims 103-111 were pending in the application, under consideration and subject to examination in the Office Action. Unrelated to any prior art rejection, appropriate claims have been amended, cancelled (without prejudice or disclaimer) or added in order to adjust a clarity and/or focus of Applicant's claimed invention. That is, the amendments to the claims are unrelated to any prior art or scope adjustment, and are simply clarified claims in which Applicant is presently interested. Therefore, at entry of this paper, Claims 103-105, 107 and 109-111 remain pending for further consideration and examination in the application.

REJECTION UNDER 35 USC §102

The 35 USC §102 rejections based upon Yamanoto Yoshiyuki (JP 04-03969) are respectfully traversed. Such rejections have been rendered obsolete by the present clarifying amendments to Applicant's claims, and accordingly, traversal arguments are not appropriate at this time. However, Applicant respectfully submits the following to preclude renewal of any such rejections against Applicant's clarified claims.

All descriptions of Applicant's disclosed and claimed invention, and all descriptions and rebuttal arguments regarding the applied prior art, as previously submitted by Applicant in any form, are repeated and incorporated herein by reference. Further, all Office Action statements regarding the prior art rejections are respectfully traversed. As additional arguments, Applicant respectfully submits the following.

Unrelated to any prior art rejection, Claim 108 has now been canceled without prejudice or disclaimer, thus rendering this rejection of such claim obsolete at this time. Patentability of remaining ones of the rejected claims are supported as follows.

In order to properly support a §102 anticipatory-type rejection, any applied art reference must disclose each and every limitation of any rejected claim. The applied art does not adequately support a §102 anticipatory-type rejection because, at minimum, such applied art does not disclose (or suggest) the following discussed limitations of Applicant's claims.

Claims 110 and 111 relating to the image processing defining process or apparatus have been clarified in a manner distinctive over Yamamoto.

Claims 103, 107 and 108 also differ from Yamamoto. More particularly, Yamamoto discloses a technique of synthesizing the status data of a device with an photographed image of a camera which images an equipment (device) of a plant, but does not disclose any technique of searching a camera which images a desired equipment among a plurality of cameras which image respective equipments. Although Yamamoto discloses a means (4 of Fig. 1; claim) for storing arrangement information of various kinds of equipments of a plant, it discloses nothing about Applicant's "storing plural pairs of information, with each pair including a name of a subject and information specifying at least one of said plurality of cameras which can monitor said subject"; (see Fig. 12, 1350 of Fig. 15 of the present application)

"inputting text indicative of the specific subject to be searched for"; (see 600 of Fig. 13) "searching the plural pairs of information for a pair of information which has data corresponding to the text having been inputted" and "selecting one of said plurality of

cameras specified by the information included in the pair of information found by the searching." Accordingly, Applicant considers that Claims 103-105, 107 and 109 are distinctive over Yamamoto,

As a result of all of the foregoing, it is respectfully submitted that the applied art would not support a §102 anticipatory-type rejection of Applicant's claims. Accordingly, reconsideration and withdrawal of such §102 rejection, and express written allowance of all of the §102 rejected claims, are respectfully requested.

REJECTION UNDER 35 USC §103

The 35 USC §103 rejections based upon Morgan (4,992,866), Ogawa Jiro (JP 61-001137), Sawyer and Lang (5,021,878) are respectfully traversed. Such rejections have been rendered obsolete by the present clarifying amendments to Applicant's claims, and accordingly, traversal arguments are not appropriate at this time. However, Applicant respectfully submits the following to preclude renewal of any such rejections against Applicant's clarified claims.

All descriptions of Applicant's disclosed and claimed invention, and all descriptions and rebuttal arguments regarding the applied prior art, as previously submitted by Applicant in any form, are repeated and incorporated herein by reference. Further, all Office Action statements regarding the prior art rejections are respectfully traversed. As additional arguments, Applicant respectfully submits the following.

Unrelated to any prior art rejection, Claims 106 and 108 have now been canceled without prejudice or disclaimer, thus rendering any rejection of such claims

obsolete at this time. Patentability of remaining ones of the rejected claims are supported as follows.

In order to properly support a §103 obviousness-type rejection, the reference not only must suggest the claimed features, but also must contain the motivation for modifying the art to arrive at an approximation of the claimed features. However, the cited art does not adequately support a §103 obviousness-type rejection because it does not, at minimum, disclose (or suggest) the following limitations of Applicant's clarified claims as discussed in comments from Applicant's foreign representative in support of the patentability of Applicant's invention.

In a large-scale system such as a plant, since the number of equipment (devices) to be monitored can be very large, many (e.g., several tens or several hundreds) monitoring cameras are required to be provided, so that an operator would be required to completely memorize configurations as to each equipment (devices), and also the correspondence between the equipment and a camera which can monitor the equipment. Although the techniques of searching data stored in a computer may (assuming arguendo) have been used in the various fields, searching of data not necessarily stored in a computer such as a live video image photographed by a monitor camera, has not been applied in a manner such as in Applicant's invention. Thus, at the time of the application of the present invention, there has been no known technique like the present invention, that a text is inputted for a search, and a camera imaging a subject matching to the inputted text is searched.

Morgan discloses a method of selecting an area on a map and searching a camera imaging the selected area.

Ogawa discloses a technique of designating a symbol thereby to operate a desired device.

None of Morgan and Ogawa would have suggested such a new operation concept of the present invention as claimed in Claims 103 and 107, that a camera imaging a subject is searched based on a name of the subject. In particular, none of Morgan and Ogawa disclose such a new operation concept of the present invention of "storing plural pairs of information, with each pair including a name of a subject and information specifying at least one of said plurality of cameras which can monitor said subject," "searching the plural pairs of information for a pair of information which has data corresponding to the text having been inputted" and "selecting one of said plurality of cameras specified by the information included in the pair of information found by the searching," as recited in Claims 103 and 107.

Office Action comments contend that the area designation unit and the process defining unit of Claims 110 and 111 correspond to the touch panel (30 of Fig. 1 of Morgan) and the processor (20 of Fig. 1 of Morgan), respectively. However, although the touch panel can designate a position or an area on a display, the touch panel itself cannot designate a position or an area within (that is, a position or an area in association with) an image displayed on a display, that is, cannot be the area designation unit of the present invention.

Further, although the processor is a means for executing defined programs, the computer itself can not be a means for defining programs and so does not teach or suggest the process defining unit of the present invention.

Moreover, none of Morgan and Ogawa teach or suggest "a storing unit which stores, in correspondence with the video camera, the operation process defined by the process defining unit" as recited in Claims 100 and 111.

As a result of all of the foregoing, it is respectfully submitted that the applied art (taken alone and in the Office Action combinations) would not support a §103 obviousness-type rejection of Applicant's claims. Accordingly, reconsideration and withdrawal of such §103 rejection, and express written allowance of all of the §103 rejected claims, are respectfully requested.

RESERVATION OF RIGHTS

It is respectfully submitted that any and all claim amendments and/or cancellations submitted within this paper and throughout prosecution of the present application are without prejudice or disclaimer of any scope or subject matter.

Further, Applicant respectfully reserves all rights to file subsequent related application(s) (including reissue applications) directed to any/all previously claimed limitations/features which have been subsequently amended or cancelled, or to any/all limitations/features not yet claimed, i.e., Applicant continues (indefinitely) to maintain no intention or desire to dedicate or surrender any limitations/features of subject matter of the present application to the public.

EXAMINER INVITED TO TELEPHONE

The Examiner is invited to telephone the undersigned at the local D.C. area number 703-312-6600, to discuss an Examiner's Amendment or other suggested

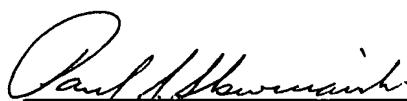
actions for accelerating prosecution and moving the present application to allowance.

CONCLUSION

In view of the foregoing amendments and remarks, Applicant respectfully submits that the claims listed above as presently being under consideration in the application are now in condition for allowance. Accordingly, early allowance of such claims is respectfully requested.

Applicant respectfully petitions for an appropriate extension of the shortened statutory period for response set by the Office Action mailed time under 37 CFR §1.136. Attached is a Form PTO-2038 authorizing payment of the requisite Petition fee. Please charge any shortage in the fees due in connection with the filing of this paper to Deposit Account No. 01-2135 (referencing case No. 500.31754CX2).

Respectfully submitted,



Paul J. Skwierawski
Registration No. 32,173
ANTONELLI, TERRY, STOUT & KRAUS, LLP
1300 North Seventeenth Street, Suite 1800
Arlington, VA 22209
Direct Dial 703-312-6636
Facsimile 703-312-6666

ATTACHMENT:
Form PTO-2038 (Fee Code 1251)